

Settlement Date: June 19, 2015 at 5:00 p.m.
Objection Deadline: June 18, 2015 at 12:00 p.m.

MILBERG LLP

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*Attorneys for Defendants in the
Relevant Adversary Proceedings*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DEFENDANTS LISTED ON APPENDIX A
ATTACHED HERETO,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. Nos. listed on Appendix A
Attached Hereto

**OBJECTION TO THE TRUSTEE'S NOTICE OF SETTLEMENT OF ORDER,
AND DEFENDANTS' SUBMISSION OF COUNTER-PROPOSED ORDER**

PLEASE TAKE NOTICE THAT the undersigned, on behalf of its clients named as defendants in the relevant adversary proceedings, objects to the Notice of Settlement of Order filed by the Trustee on June 15, 2015, with respect to the entry of orders to effectuate the Court's

Memorandum Decision Regarding Omnibus Motions to Dismiss entered June 2, 2015. The grounds of objection are stated in the letter from the undersigned counsel, which is attached to this objection as Exhibit A. A counter-proposed order is attached as Exhibit B. A comparison of the counter-proposed order to the Trustee's original proposed order is attached as Exhibit C.

Dated: New York, New York
June 18, 2015

MILBERG LLP

By: /s/ Matthew A. Kupillas
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